

# **EXHIBIT H**

	<p>separately identified as “a plurality of connecting posts.”</p> <p>Further, the CJB6 cannot be configured to have simultaneously attached a “plurality of retrofit clips” as well as “a plurality of new construction clips” as required by limitation [1b], below.</p> <p>As explained in Defendants’ Motion to Dismiss, the CJB6 cannot be configured such that the alleged “retrofit clips (102)” and the alleged “new construction clips (104)” are simultaneously attached to the LED light fixture at the same time, as required by Claim 1. The CJB6 includes one set of screw holes, which only allows one set of clips (either new construction or retrofit clips) to be attached to the LED light fixture. In other words, the CJB6 cannot directly infringe because it cannot be operably assembled into a single apparatus having both types of clips. Cooper incorporates the arguments presented in Defendants’ Motion to Dismiss, and Reply in support thereof, as if set forth fully herein.</p>
[1b] a plurality of new construction clips (104);	<p>The CJB6 does not have “a plurality of new construction clips.”</p> <p>For example, the CJB6 cannot be configured to have simultaneously attached a “plurality of new construction clips” identified by Plaintiff, as well as the “plurality of retrofit clips” identified by Plaintiff and required by limitation [1a].</p>